From:	PETERSON Jenn L
To:	Burt Shephard/R10/USEPA/US@EPA; Joe Goulet/R10/USEPA/US@EPA; rgensemer@parametrix.com; Jeremy_Buck@fws.gov; Chris Thompson; Robert.Neely@noaa.gov
Cc:	Eric Blischke/R10/USEPA/US@EPA; Chip Humphrey/R10/USEPA/US@EPA; ANDERSON Jim M
Subject:	Surface Water SLVs
Date:	11/01/2006 05:34 PM
Attachments:	OAR340Div041Tbl20.pdf Copy of ToxicsCriteriaTable.xls

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I was hoping someone could offer some clarity on the thinking behind the water SLVs.

Are we not using any Table 20 values where appropriate? - for example where the old DEQ numbers (Table 20) are lower than the National AWQC? The attached table states "OAR 340-041-0033 stipulates that for those criteria for stringent than the criteria in effect before rule adoption, the Table 33A criteria are effective and for the remaining criteria, Table 20 criteria are effective. However, for Clean Water Act purposes, only more stringent State criteria can be used." DEQ is currently using a combination of Table 20 and Table 33A depending on which is more stringent (see attached file entitled "copy of toxics criteria table"). It is my understanding that there are some National AWQC that are not planned to be consulted on by EPA (approved) for use in Oregon (e.g. mercury). Beyond criteria values, another difference is that the national number are based on dissolved criteria, but DEQ's Table 20 values are based on total recoverable metal.

I didn't look through all of the contaminants, but I was puzzled by a few. For example, why are we using one of DEQ's narrative criteria for dioxin as an acute standard? These are not based on risk. Also, they still seem to be citing the chronic value of 0.0001 instead of the 0.000001 ug/L as directed by EPA's comments.

Why do we have Aroclor values in water that are a lot higher than the total PCBs number? Won't we always be totaling the PCB congeners (or Aroclors) to get a total PCB number - no matter what the total is based on? According to 33A the total PCB number (the AWQC is the same as the tier II value shown here) "applies to total PCBs (e.g. the sum of all congener or all isomer or homolog or Aroclor analyses)". It seems like the table should be changed to reflect the same concept as total DDTs.

Why did we multiply the chronic value times 50 to get an acute value? It may be conservative to get a chronic value from an acute value to divide by 50, but I wouldn't multiply a chronic value by 50 to get an acute value. I am guessing the conversion is more like 3 unless we know something about the dose response curve.

In general I am confused by the fact that I cannot tell what the citation of "ODEQ" means. The associated footnote indicates they are citing the division 4 state wide management plan as the source from 2002. I cannot locate this document, but it is clear that things have definitely been updated since 2002. What was the hierarchy used within DEQ's available criteria? They should be citing the appropriate specific source whether the value came from DEQ's AWQC (33A or Table 20), DEQ's Eco RA Surface Water SLVs or 33B or 33C (narrative criteria). If someone has the reference they are citing can you pass it along? I am trying to understand where the values came from.

Thanks!

<<OAR340Div041Tbl20.pdf>> <<Copy of ToxicsCriteriaTable.xls>>